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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

March 22, 2000

Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

**Re: Ex Parte Presentation
CC Docket No. 99-301
(Local Competition and Broadband Reporting)**

Personal
Communications
Industry
Association

Dear Ms. Salas:

On Tuesday, March 21, 2000, the Personal Communications Industry Association (PCIA), represented by Brent Weingardt and Todd Lantor, met with Rebecca Beynon of the Office of Commissioner Harold Furchtgott-Roth, regarding the above-referenced proceeding.

During the meeting, PCIA representatives stated that any data provided to the Commission must remain confidential and, at the very least, that any information provided must not be linked to individual carriers. PCIA representatives also expressed concern that by failing to treat such proprietary information as routinely confidential, the Commission will be allowing competitors to use the Commission's data collection process as a means of targeting the very companies that it hopes to nurture.

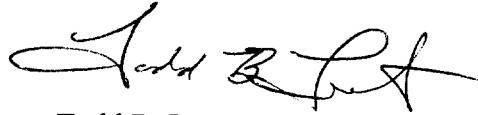
PCIA representatives noted that should the Commission feel compelled to move forward with its proposed mandatory initiative, the FCC must do everything possible to reduce the burden of the requirement on wireless carriers. In that regard, the FCC should only require carriers to submit the data annually and on a state-specific basis. Moreover, PCIA representatives explained that no carrier should be required to modify their business practices to meet the Commission's proposed requirements.

PCIA representatives stated that the FCC should increase the 1,000-subscriber threshold level established for broadband providers and endorsed NCTA's threshold proposal for broadband providers of 5,000 nationally and 1,000 in each individual state. PCIA representatives also encouraged the FCC to re-visit or sunset the data collection after two years to ensure that the program does not outlive its usefulness. Attached is a summary of the issues covered during the meeting and PCIA's position on each of the issues.

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Pursuant to Section 1.1206 of the Commission's Rules, one original and one copy of this letter are being filed with your office. If you have any questions regarding this filing, please feel free to contact me at (703) 739-0300.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd B. Lantor". The signature is fluid and cursive, with a large initial "T" and a stylized "L" at the end.

Todd B. Lantor
Director – Government Relations
Personal Communications Industry Association

Enclosure

cc: Rebecca Beynon

**PCIA Position Statement
Local Competition and Broadband Reporting
CC Docket No. 99-301
March 22, 2000**

As noted in both our comments and reply comments in this proceeding, PCIA encourages the FCC to adopt each of the following recommendations concerning the establishment of local competition and broadband reporting requirements:

- PCIA believes the proposed reporting requirements should be voluntary.
- The FCC could reduce the burden on carriers by using a sampling to determine the status of local competition and advanced telecommunications deployment.
- No carrier should be required to modify their business practices to meet the Commission's proposed requirements.
- The FCC must treat the data confidentially and ensure that the information provided cannot be linked back to individual carriers.
- The FCC should ensure that only aggregated data, by industry sector, is made public.
- The FCC should only require carriers to submit the data on a state-specific basis and no more often than annually.
- The FCC should increase the 1,000 subscriber threshold level established for broadband providers.
- PCIA would endorse NCTA's threshold proposal for broadband providers of 5,000 nationally and 1,000 in each individual state.
- Nothing in Section 706 justifies the gross discrepancy in the treatment of wireline and broadband providers.
- If the FCC is going to lower the threshold level for broadband providers below 1,000 subscribers, the FCC should allow small broadband providers to complete create a simple, abbreviated form.
- The FCC should sunset the data collection obligation after two years to ensure that the program does not outlive its usefulness.
- The FCC's proposed data collection should not duplicate other federally- or state-imposed initiatives.